

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

KARL V. FARMER, )  
                        )  
                        )  
                        Plaintiff, )  
                        )  
                        )  
                        v.              ) Civil Action No. 1:05-cv-10117-RGS  
                        )  
                        )  
NEAL D. GOLDMAN, )  
                        )  
                        )  
                        Defendant. )  
                        )  
                        )

---

**JOINT MOTION TO CONTINUE SCHEDULING CONFERENCE**

In accordance with guidance from clerk Mary Johnson, Plaintiff Karl Farmer and Defendant Neal Goldman hereby jointly request that the Scheduling Conference currently scheduled for September 7, 2005 be continued in light of the anticipated settlement of this action.

More specifically, the parties state as follows:

1. The parties conferred via telephone on August 29, 2005, to prepare for the scheduling conference. During this telephone call, Goldman's counsel advised Farmer of certain newly-discovered evidence which undercut Farmer's claim. Farmer acknowledged the strength of that evidence.
2. The parties are now close to a settlement which would terminate this action.
3. The anticipated settlement is contingent on the agreement of an insurance company and certain documentation satisfactory to Goldman.
5. The parties will promptly report to the Court upon settlement of this action.

WHEREFORE, Plaintiff Karl Farmer and Defendant Neal Goldman hereby jointly request that the Pre-Trial Conference currently scheduled for September 7, 2005 be continued until a date convenient to the Court.

KARL FARMER

/s/ Karl Farmer  
30 Sawyer Road  
Hampstead, NH 03841  
(603) 329-1165

NEAL GOLDMAN

By his attorneys,

/s/ Claire Bishop  
Michael Pontrelli (BBO #549194)  
Claire Bishop (BBO #660363)  
Foley & Lardner LLP  
111 Huntington Avenue  
Boston, MA 02199  
(617) 342-4000

Dated: August 30, 2005